EXHIBIT O

UNITED STATES DISTRICT COURT

DISTRICT OF MASSACHUSETTS

SINGULAR COMPUTING, LLC., Plaintiff, vs. GOOGLE, LLC., Defendant.	No. C.A. No: 1:19-cv-12551-FDS

VIDEOCONFERENCE DEPOSITION OF MIRIAM LEESER, Ph.D.,

Deposition taken with all parties appearing remotely,

on Wednesday, March 8, 2023, commencing at 10:59 a.m.

Court Reporter:
Pamela J. Carle, LCR, RPR, CRR

on an FPGA using VFLOAT. You testified to that earlier. Do you recall that?

A. Yes.

Q. Do you believe that any one of those circuits would anticipate the asserted claims?

MR. NARAYEN: Objection, vague.

A. So I lay out in the report what the claims are in the patent and how I view the VFLOAT library anticipates those claims.

BY MR. SEEVE:

Q. Okay. So in the report you talk about a configuration that you and Pavle Belanovic created that contains 61 C2 multipliers. Do you recall that?

A. Yes, I do.

Q. And C2 refers to a particular floating point format that has 1 sign bit and 9 mantissa bits and 6 exponent bits, is that correct?

A. I know I refer to that particular configuration in my report, I don't remember exactly the numbers. Can you tell me what page that is on?

Q. For example, you can just look at page 46, paragraph 120. It's at the top of page 46.

A. It was, yes, C2 format with 6

MR. SEEVE: I don't know who that is.

MR. NARAYEN: Is says Prince Lobel. I'm just curious, if it must be someone else joining us.

MR. SEEVE: I'm sorry, I just got a message indicating it's our paralegal, who for some reason doesn't have her name showing up.

MR. NARAYEN: Okay.

BY MR. SEEVE:

Q. So back to the SRAM. Just for the purposes of clarity in the transcript I want to just clarify, you are referring to the box labeled SRAM that is to the left of the bottom blue box in the diagram, and it's just to the right and under the green box labeled PCI controller, is that correct?

A. So there are, I believe, 13 boxes labeled SRAM in this diagram, and any of them are memories that are accessible to the three PEs. The one off of the local address data bus is the one just to the right of the PCI controller box.

Q. The C2 multipliers were on only one of the PEs, though, right?

A. That's correct.

Q. So they wouldn't have had access to all

of these SRAMs, would they?

A. Whatever PE they were on they would have had access to SRAM. Which particular boxes depends on what --

Q. And in your report the SRAM you referred to is also an SRAM that was accessible by the host workstation as well, right? That's in paragraph 164.

A. So paragraph 164 does, in fact, talk about SRAM accessible from the host, and I believe any of the SRAM -- well, it's clear that that one box we're talking about was accessible to the host.

Q. I'm sorry, I can't tell, are you in the middle of an answer?

A. The block that's hanging off the local address, slash, data bus that's labeled SRAM is accessible directly from the host over the PCI bus.

Q. So your contention is the execution unit, which the court has construed to mean a processing element comprising an arithmetic circuit paired -- sorry, let me start again.

You're arguing that the execution unit, which the court has construed to mean processing element comprising an arithmetic circuit paired with a memory circuit, is met by the C2

multiplier, which includes the arithmetic circuit and the SRAM that's hanging off the data bus, correct?

MR. NARAYEN: Objection, mischaracterizes the witness' testimony, mischaracterizes the report.

A. I would say I think that's correct.

BY MR. SEEVE:

Q. And let's turn to the term low precision high dynamic range. You're aware that the court has construed this term as well, correct?

A. Correct.

Q. And the court construed low precision high dynamic range to be defined or construed as defined in the claim itself. Do you understand that?

A. Yes, I do.

Q. And do you understand the court's construction to be referring to the numbers that specifically defined the limits on the level of precision and the range representable by the signals that it clears, you understand that? That's what the court's construction is referring to?